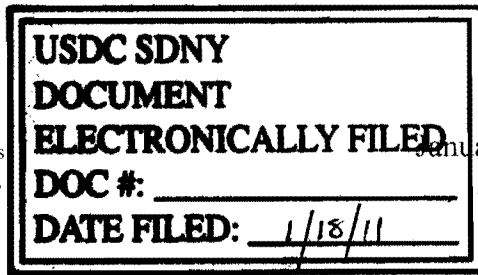


Wayne N. Outten
 Anne Golden
 Adam T. Klein
 Laurence S. Moy
 Kathleen Peratis
 Justin M. Swartz
 Jack A. Raisner
 Wendi S. Lazar
 Carmelyn P. Malalis
 Tammy Marzighiano
 René S. Roupinian

OUTTEN & GOLDEN
Advocates for Workplace Fairness



January 14, 2011

By Hand

Hon. Deborah Freeman
 United States Magistrate Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007
 Facsimile: (212) 805-4258

Both requests are granted

SO ORDERED:

DATE: 1/18/11

Re: Silverstein v. AllianceBernstein L.P.,
 No. 09-CIV-5904 (VM)

DEBRA FREEMAN
 UNITED STATES MAGISTRATE JUDGE

Dear Judge Freeman:

This firm represents Plaintiffs in the above-referenced action. As directed by Judge Marrero, we submit this joint letter on behalf of both parties with respect to two unopposed requests.

First, on behalf of Plaintiffs, we respectfully request a 60-day extension to the first phase of the discovery period, currently scheduled to close on February 1, 2011. This is the first request for such an extension.¹ The parties have been working diligently to complete discovery. Defendant recently produced a large volume of documents, which Plaintiffs are reviewing to determine whether additional documents are outstanding. The parties request the additional time in order to schedule the depositions of Named Plaintiff Jennifer Stamatelos and two additional Rule 30(b)(6) witnesses. The only other date affected by the proposed extension is the status conference currently scheduled before Judge Marrero on February 4, 2011. Defendant does not oppose this request.

Second, Defendant AllianceBernstein respectfully requests leave to file an amended Answer to Plaintiffs' First Amended Class Action and Collective Action Complaint. Defendant recently learned that two statements in its Answer are inaccurate, and wishes to file an amended answer in order to correct those misstatements. A copy of the proposed First Amended Answer and Affirmative and Other Defenses to First Amended Class Action and Collective Action Complaint is attached hereto. Plaintiffs do not oppose this request.

¹ The parties initially engaged in limited discovery in the hopes of settling the matter. This is the first request to the discovery schedule entered into following the failure of mediation efforts.

Allegra L. Fishel
 Lewis M. Steel
 Nantiya Ruan
 Samuel R. Miller
 Paul W. Mollica

Delyanne D. Barros
 Rachel M. Bien
 Katherine Blostein
 Molly Brooks
 Cara E. Greene
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 Sonia R. Lin
 Jennifer Liu
 Seth M. Marnin
 Ossau Miazad
 Melissa Pierre-Louis
 Sandra Pullman
 Lauren Schwartzreich
 Michael Scimone
 Dana Sussman
 Juno Turner

JAN 18 2011

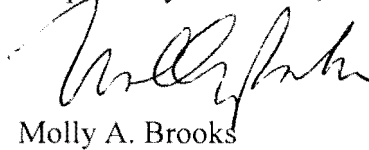
Hon. Deborah Freeman

January 14, 2011

Page 2 of 2

We thank the Court for its attention.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Molly A. Brooks", is written over the typed name.

Molly A. Brooks

cc: Lorie Almon, Esq. (by email)
Robert S. Whitman, Esq. (by email)
Mary Ahrens, Esq. (by email)
Adam T. Klein, Esq.
Juno Turner, Esq.
Gregory R. Fidlton, Esq.